Postal Regulatory Commission Submitted 2/7/2014 3:19:09 PM Filing ID: 89138 Accepted 2/7/2014

## BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268

| D0050 M / /                      | D   1   1   1   1   1   1   1   1   1 |
|----------------------------------|---------------------------------------|
| DSCF STANDARD MAIL LOAD LEVELING | Docket No. N2014-1                    |
|                                  |                                       |

## UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF RESPONSE TO QUESTION 7(a) OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 1 (January 24, 2014)

The United States Postal Service moves for late acceptance of the response of witness Malone filed today in answer to Question 7(a) of Presiding Officer's Information Request No. 1. The response was due to have been filed on January 31, 2014, which makes it seven calendar days late.

The question calls for the extraction of data from many tens of thousands of mailing statements. Initial queries to the relevant data system seeking a year's worth of responsive data repeatedly caused the system to crash, making the provision of a timely response impossible. As a result, less ambitious data queries by month are being executed to extract data. These queries on a monthly basis do not appear to generate the same system stability problem, but are time-consuming, nevertheless. The Postal Service is striving to generate data responsive to Question 7(a) in this piecemeal fashion and to provide an aggregate Fiscal Year 2013 response as expeditiously as possible.

The partial response to Question 7(a) filed today for the month of October 2012 is offered as evidence of the effort currently underway. The Postal Service

regrets the delay in responding to Question 7(a), and trusts that any prejudice is deemed minimal under the circumstances.

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno Chief Counsel Global Business & Service Development

Michael T. Tidwell

475 L'Enfant Plaza, S.W. Washington, D.C. 20260-1137 (202) 268-2998; Fax -5402